

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

THE BLOOMINGBURG JEWISH
EDUCATION CENTER, INC. ET AL,
Plaintiffs,

vs.

THE VILLAGE OF BLOOMINGBURG, ET
AL,

Defendants

Case No.: 14 –CV-07250-KBF

NOTICE OF MOTION TO QUASH NON-
PARTY DISCOVERY SUBPOENAS

PLEASE TAKE NOTICE that upon the accompanying Memorandum, and the declaration of Alan M. Goldston, dated March 2015, and the Exhibits thereto, and upon all other relevant papers filed and proceedings had, the subpoena-respondents Rural Community Coalition, Inc., Anita Hoppe, Teek Persaud and Holly Roche (“Movants”) will move this court at the United States Courthouse, 300 Quarropas Street, White Plains, NY on a date and time to be determined by the Court, for an order quashing the subpoenas for the production of documents and appearance for deposition, issued by plaintiffs’ counsel Dechert LLP to movants on or about March 9, 2015, on the grounds that such subpoenas, and each of them, are unreasonable and oppressive on their face, unduly burdensome, improperly intrusive into and burdensome upon Constitutionally protected activities, beyond the scope of the litigation, and so poorly drawn as to make compliance unreasonably difficult, all as more particularly specified in the declaration of Alan M. Goldston, submitted herewith.

Dated this March 20, 2015

Alan M. Goldston, Esq.

s/Alan M. Goldston
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VIA EMAIL AND ECF